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Invoice #: PLOCH01

Case: Ploch v. MRS BPO, LLC

 Hourly Rate:
 \$295.00

 Billing Increments:
 1/10 Hour

 Date of Invoice:
 3/29/2012

Responsible Attorneys: Richard A. Voytas, Jr. (RAV), James W. Eason (JWE)

Date	Work Description	Hours Worked/Atty ID	Amount Billed
2/9/2012	Meet with Arric Ploch and review collection correspondence and recorded telephone call from February 8 and discuss concerns about debt amount being higher than client recorded. Discuss options for disputing debt, requesting validation, and potential litigation.	2.5-RAV	\$737.50
2/9/2012	Research potential Defendant MRS BPO for history of non-compliance with FDCPA, consumer complaints, and ability to satisfy judgment.	1.5-JWE	\$442.50
2/10/2012	Receive and review additional collection correspondence from client dated February 8. Discuss breach of FDCPA with client and receive request to file suit. Discuss litigation strategy and timeline.	.5-RAV	\$147.50
2/18/2012	Legal Research on 15 USC 1692g "overshadowing" violation in preparation of drafting of Petition.	1.5-RAV	\$442.50
2/18/2012	Work on drafting Petition.	2.5-RAV	\$737.50
2/19/2012	Work on drafting Petition.	1.5-RAV	\$442.50
2/20/2012	Locate Process Server in Springfield, Illinois and negotiate service rate. Prepare Motion for Appointment of Special Process Server accordingly.	.5-JWE	\$147.50
2/20/2012	Finalize and file Petition and Motion for Special Process Server.	.5-JWE	\$147.50
2/21/2012	Receive Summons; forward to process server.	.2-JWE	\$59.00

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2/29/2012	Received call from process server confirming service. Request Notarized Return and receive the same from process server.	.2-JWE	\$59.00
3/2/2012	Received call from client requesting update; discuss service and timeline for response.	.5-RAV	\$147.50
3/14/2012	Receive email from opposing counsel Cindy Salvo requesting settlement demand. Telephone client and obtain authority to resolve suit. Draft email to Cindy Salvo providing settlement terms.	.8-RAV	\$236.00
3/14/2012	Receive nuisance value settlement offer from Cindy Salvo. Telephone client and inform client of offer. Receive instructions from client to reject nuisance value offer and to begin working up the case on the merits. Draft email to Cindy Salvo rejecting offer and explaining that Plaintiff wanted to work up case on the merits.	.5-RAV	\$147.50
3/14/2012	Begin working on drafting Affidavit of Arric Ploch in support of Motion for Summary Judgment.	.5-RAV	\$147.50
3/14/2012	Begin drafting Statement of Uncontroverted Facts in support of Motion for Summary Judgment.	2.0-RAV	\$590.00
3/15/2012	Finalize Affidavit of Arric Ploch. Meet with client and review affidavit and edit accordingly.	1.0-RAV	\$295.00
3/15/2012	Finalize Statement of Uncontroverted Facts with edited Affidavit of Arric Ploch.	.8-RAV	\$236.00
3/15/2012	Work on researching 1692g summary judgment cases in 8 th Circuit and in EDMO; work on drafting Memorandum in Support of Motion for Summary Judgment.	6.5-RAV	\$1917.50
3/16/2012	Draft Motion for Summary Judgment.	1.0-RAV	\$295.00
3/16/2012	Finalize Memorandum in Support of Motion for Summary Judgment and prepare all exhibits for filing.	5.5-RAV	\$1622.50
3/16/2012	Draft email to Cindy Salvo serving MSJ and related documents.	.2-RAV	\$59.00
3/21/2012	Receive and review removal documents from e- filing system; review to determine if Motion for Remand appropriate.	.5-RAV	\$147.50
3/21/2012	Reformat and refile Motion for Summary Judgment in United States District Court for the Eastern District of Missouri such that Motion will be in compliance with Local Rules. Forward new copies to opposing counsel.	.5-RAV	\$147.50
3/23/2012	Complete consent to magistrate form.	.2-RAV	\$59.00
3/24/2012	Receive and review Offer of Judgment from Defendant conceding liability for actual and statutory damages; telephone client on same.	1.0-RAV	\$295.00
	TOTAL DUE	Total Hours: 32.9	\$9,705.50